Appl. No. 09/927,255
Response Dated August 2, 2005
Reply to Office Action of May 2, 2005

REMARKS

Summary

Claims 1-28 are presently pending in this application. Favorable reconsideration and allowance of the pending claims are respectfully requested.

35 U.S.C. § 102

In the Office Action, claims 1-28 were rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent 6,226,675 to Meltzer et al. ("Meltzer"). Applicant respectfully traverses the rejection, and requests reconsideration and withdrawal of the § 102(e) rejection.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102, the cited reference must teach every element of the claim. *See* MPEP § 2131, for example. Applicant submits that the Meltzer reference fails to teach each and every element recited in claims 1-28 and thus they define over the Meltzer reference. For example, with respect to claim 1, the Meltzer reference fails to teach, among other things, the following language:

> a content based switching decision logic to compare said
> document object with said pattern object, and to make a
> switching decision for a message based upon said
> comparison.

According the Office Action, this language is disclosed by the Meltzer reference at column 4, lines 54-55. Applicant respectfully disagrees. The Meltzer reference at the given cite, states "the specification of the input and output documents includes

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interpretation information for at least one of the sets of storage units identified by the

logical structure." There is no mention of content based switching in any context, let

alone "a content based switching decision logic to compare said document object with

said pattern object, and to make a switching decision for a message based upon said

comparison" as recited in claim 1. This language is clearly not disclosed by the Meltzer

reference.

The Meltzer reference also fails to teach, among other things, the following

language:

> a pattern parser to parse the pattern information for one or
> more elements according to a predefined pattern object data
> structure and to place said elements in appropriate blocks
> within said pattern object data structure....

According to the Office Action, this language is disclosed by the Meltzer reference at

column 3, lines 33-36. Applicant respectfully disagrees. The Meltzer reference at the

given cite, states:

> The participant in the transaction receives data comprising
> a document through a communication network. The
> participant parses the document according to the
> specification stored for a transaction to identify an input
> document for the transaction.

As indicated above, the Meltzer reference arguably discloses at best parsing a single

document to create an input document. By way of contrast, however, claim 1 parses at

least two documents, the first document to include "transaction information of a

message" and the second document to include "pattern information." The Meltzer

reference fails to disclose parsing at least two documents, but rather limits itself to a

single input document. Furthermore, the Meltzer reference fails to disclose the particular

types of documents explicitly recited in claim 1. For example, claim 1 recites language

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associated with a "pattern," such as a "pattern parser," "pattern information," "pattern object," and "pattern object data structure." As indicted by the Specification, a "pattern" may comprise "a particular set of information" within a document. Specification, Page 3, Lines 5-7. Examples may include application data from the document, such as one or more XML tags and/or data identified by the XML tags. Specification, Pages 17-19. The Meltzer reference fails to disclose that "pattern information" or "a particular set of information" within a document is parsed into a "pattern object data structure." In fact, the cited material fails to disclose any type of data structure at all, let alone a "pattern object data structure" as recited in claim 1. In another example, the Meltzer reference fails to disclose "transaction information of a message." As indicated in the Specification, "transaction information" may comprise "actual content or business information (e.g., business transaction information) within the message body." Specification, Page 7, Lines 18-20. The Meltzer reference fails to disclose such "transaction information," let alone "a document object generator to receive transaction information of a message and create a document object from said transaction information" as recited in claim 1.

For at least the reasons given above, the Meltzer reference fails to disclose all the elements or features of the claimed subject matter. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to independent claim 1. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection with respect to claims 2-12, which depend from claim 1 and therefore contain additional language that further distinguish these claims from the Meltzer reference.

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Independent claims 13, 23, 25 and 27 recite language similar to those recited in claim 1. Therefore, for reasons analogous to those presented with respect to claim 1, Applicant respectfully submits that claims 13, 23, 25 and 27, and all claims directly or indirectly depending therefrom, are not anticipated and are patentable over the Meltzer reference. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to these claims.

Conclusion

For at least the reasons set forth above, Applicant submits that independent claims 1, 13, 23, 25, and 27 are allowable and that dependent claims 2-12, 14-22, 24, 26, and 28 are allowable by virtue of their dependency from allowable independent claims, as well as on their own merits. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the § 102(e) rejection of claims 1-28.

Applicant does not otherwise concede, however, the correctness of the Office Action's rejection with respect to any of the dependent claims discussed above. Accordingly, Applicant hereby reserves the right to make additional arguments as may be necessary to further distinguish the dependent claims from the cited references, taken alone or in combination, based on additional features contained in the dependent claims that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

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Applicant submits that the application is in condition for allowance and requests favorable reconsideration and allowance of the pending claims.

The Examiner is invited to contact the undersigned at 724-933-3387 to discuss any matter concerning this application.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

s/John F. Kacvinsky/s

John F. Kacvinsky, Reg. No. 40,040
Under 37 CFR 1.34(a)

I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office at (571) 273-8300 on: 8/2/05 .

Rachael Brown   8/2/05
                                            Date

Dated: August 2, 2005

12400 Wilshire Blvd., 7th Floor
Los Angeles, California 90025 .

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[1] Without the benefit of the Office's reasoning as to the motivation to combine the cited references, Applicant is unable to analyze the merits of the Office's reasoning.

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